

REMARKS/ARGUMENTS

Claims 1-3, 7-8, 10-29, 45, 47-61, 68-69, 109, 127-135 and 151 are currently pending in the application. Claims 30-34, 110, 112 and 136-138 have been withdrawn from consideration in response to a restriction requirement with traverse. Claims 4-6, 9, 35-44, 46, 62-67, 70-108, 111, 113-126, 139-150 and 152 have been canceled without prejudice. Claims 1-29, 45-61, 64, 68, 69, 109-111, 127-135 and 151 were rejected in the Office Action mailed March 11, 2009 (hereinafter referred to as "Office Action").

Applicants hereby request three month extension of time to respond to the Office Action. A credit card authorization is being submitted herewith to pay the required fees. The Director is hereby authorized to charge any additional fees(s) or underpayments of fee(s) under 37. C.F.R. §§ 1.16 and 1.17 to Deposit Account 50-4863. In view of the following remarks and amendments, applicants respectfully request a timely Notice of Allowance be issued in this case.

Claim Objections

The Office Action objected to claims 16, 22, 45-46, 55, 58 and 151 because of various informalities. Applicants respectfully submit the foregoing amendments correct the informalities listed in the Office Action. As a result, applicants respectfully request reconsideration and withdrawal of the objections to claims 16, 22, 45-46, 55, 58 and 151.

Claim Rejections under 35 U.S.C. § 112, second paragraph

The Office Action rejected claims 18-20, 26-28, 50-52, 54, 56, 60-61, 64, 68-69 and 134 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. Applicants respectfully submit the foregoing amendments correct the language objected to in the Office Action. As a result, applicants respectfully submit that claims 18-20, 26-28, 50-52, 54, 56, 60-61, 68-69 and 134, as amended, are not indefinite and are, therefore, allowable under 35 U.S.C. § 112. Applicants respectfully request reconsideration and withdrawal of the rejections to claims 18-20, 26-28, 50-52, 54, 56, 60-61, 68-69 and 134.

Claim Rejections under 35 U.S.C. § 101

The Office Action rejected claims 1-29, 49-52, 54-61, 64, 68-69, 109-111, 127-135 and 151 under 35 U.S.C. § 101 because the claimed invention is directed to

nonstatutory subject matter. Applicants respectfully submit the foregoing amendments recite statutory subject matter. As a result, applicants respectfully submit that claims 1-3, 7-8, 10-29, 49-52, 54-61, 68-69, 109, 127-135 and 151, as amended, are not indefinite and are, therefore, allowable under 35 U.S.C. § 112. Applicants respectfully request reconsideration and withdrawal of the rejections to claims 1-3, 7-8, 10-29, 49-52, 54-61, 68-69, 109, 127-135 and 151.

Claim Rejections under 35 U.S.C. § 102

The Office Action rejected claims 1-8, 10, 14-15, 17-29, 46-58, 109 and 151 under 35 U.S.C. § 102(b) as being anticipated by Brown, et al. (U.S. Patent No. 5,875,446). Claim 111 was rejected under 35 U.S.C. § 102(e) as being anticipated by Dulong, et al. (U.S. Patent Publication No. 2001/0049673). Claims 127-130 and 132-135 were rejected under 35 U.S.C. § 102(e) as being anticipated by Adamic, et al. (U.S. Patent Publication No. 2003/0186243).

For anticipation, a single reference must identically disclose every element of the claimed invention. *Corning Glass Works v. Sumitomo Electric*, 9 USPQ 2d 1962, 1965 (Fed. Cir. 1989). A reference that excludes a claimed element, no matter how insubstantial or obvious, is enough to negate anticipation. *Connell v. Sears, Roebuck & Co.*, 220 USPQ 193, 198 (Fed. Cir. 1983). Applicants respectfully submit that claims 1-3, 7-8, 10, 14-15, 17-29, 47-58, 109, 127-130, 132-135 and 151 are not anticipated by the cited references and are, therefore, allowable under 35 U.S.C. § 102(b) for the reasons stated below.

Claims 1, 109 and 151

First, the Office Action indicated that Brown “does not expressly teach filtering . . . by lexical processing.” (page 14, lines 1-3). Applicants agree. As a result, claims 1, 109 and 151 are allowable under 35 U.S.C. § 102(b).

Second, the Office Action indicated that Brown teaches “[a]n object relationship database comprising objects from the one or more domains of information.” (page 6, lines 20, 23-24). Applicants respectfully disagree. The objects disclosed in Brown are defined as: “Hypermedia objects 140 are items such as books, articles, reports, pictures, movies, or recordings that contain text, images, video, audio, or any other multimedia object and/or information. One or more hypermedia objects are stored on one or more computers in the environment.” (col. 6, lines 26-30). Applicants respectfully submit that these objects are not identical to “a noun, a verb, an adjective, an adverb, a phrase, a sentence, a symbol or a numeric character” as recited in claims 1, 109 and 151, as amended. As a result, claims 1, 109 and 151 are allowable under 35 U.S.C. § 102(b).

Third, the Office Action indicated that “Brown further teaches wherein the relationships between two or more objects are identified as direct or indirect.” (page 7, lines 4-5). Applicants respectfully disagree for the reasons explained below in reference to the Section 103 rejections.

Fourth, the Office Action indicated that “Brown further teaches wherein the relationships between the two or more integrated objects are ranked based on the relative strength of the relationship between direct and indirect objects.” (page 7, lines 6-8). Applicants respectfully disagree for the reasons explained below in reference to the Section 103 rejections.

Fifth, the Office Action indicated that “Brown further teaches wherein the relationships are set into categories selected from the group consisting of positive, negative, physical, and logical associations.” (page 7, lines 9-11). Applicants respectfully disagree for the reasons explained below in reference to the Section 103 rejections.

For at least the reasons stated above, applicants respectfully submit Brown does not identically disclose every element recited in claims 1, 109 and 151, as amended. Claims 1, 109 and 151 are, therefore, allowable under 35 U.S.C. § 102(b). Accordingly, applicants respectfully request that the rejection of claims 1, 109 and 151 be withdrawn.

Claim 127

First, applicants respectfully submit that Adamic does not identically disclose “where relationships between two or more objects within the Object-Relationship Database are: (a) identified as a direct relationship or an indirect relationship” as recited in claim 127, as amended. Adamic discloses “[a] method of finding genes associated with a disease.” (Abstract, line 1). But, applicants respectfully submit that Adamic does not identically disclose identifying indirect relationships between objects as recited in claim 127, as amended. As a result, claim 127 is allowable under 35 U.S.C. § 102(b).

Third, applicants respectfully submit that Adamic does not identically disclose “where relationships between two or more objects within the Object-Relationship Database are: . . . (c) grouped into categories selected from the group consisting of a positive effect, a negative effect, a physical association and a logical association” as recited in claim 127, as amended. As a result, claim 127 is allowable under 35 U.S.C. § 102(b).

Fourth, applicants respectfully submit that Adamic does not identically disclose “where relationships between two or more objects within the Object-Relationship Database are: . . . (d) ranked based on a relative strength of the identified relationship between direct and indirect objects” as recited in claim 127, as amended. Since Adamic does not identically disclose relationships between indirect objects as described above, applicants respectfully submit that Adamic does not identically disclose ranking

objects based on a relative strength between direct and indirect objects as recited in claim 127, as amended. As a result, claim 127 is allowable under 35 U.S.C. § 102(b).

Fifth, applicants respectfully submit that Adamic does not identically disclose “where relationships between two or more objects within the Object-Relationship Database are: . . . (c) filtered by lexical processing. . . .” as recited in claim 127, as amended. As a result, claim 127 is allowable under 35 U.S.C. § 102(b).

For at least the reasons stated above, applicants respectfully submit Adamic does not identically disclose every element recited in claim 127, as amended. Claim 127 is, therefore, allowable under 35 U.S.C. § 102(b). Accordingly, applicants respectfully request that the rejection of claim 127 be withdrawn.

Claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135

Applicants respectfully submit that claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135 depend from claims 1 and 127 which are allowable for the reasons stated above, and further distinguish over the cited references. Claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135 are, therefore, allowable under 35 U.S.C. § 102(b). Accordingly, applicants respectfully request that the rejection of claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135 be withdrawn.

Claim Rejections under 35 U.S.C. § 103(a)

The Office Action rejected claims 23, 27 and 29 under 35 U.S.C. § 103(a) as being unpatentable over Brown. Claim 111 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Dulong in view of Brown. Claim 28 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Ellis, et al. (U.S. Patent No. 6,654,736). Claims 9-14, 17-20, 24-25 and 110 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Kennedy, et al. (U.S. Patent No. 6,269,364). Claims 16, 26, 59-61, 64, 68 and 69 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Adamic. Claim 45 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Hong, et al. (U.S. Patent No. 5,764,799). Claim 131 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Adamic in view of Deligne, et al. (U.S. Patent No. 6,314,399). Claims 127-130 and 132-135 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Adamic in view of Brown. Claim 131 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Adamic in view of Brown, and further in view of Deligne. Applicants respectfully submit that claims 1-3, 7-8, 10-29, 45, 47-61, 68-69, 109, 127-135 and 151, as amended, are patentable over the cited references for at least the reasons described below.

Claims 1, 109, 127 and 151

First, applicants respectfully submit that the cited references, either alone or in combination, do not disclose, teach or suggest “where relationships between two or more

objects within the Object-Relationship Database are: (a) identified as a direct relationship or an indirect relationship" as recited in claims 1, 109, 127 and 151, as amended. The Office Action indicated that "Brown further teaches wherein the relationships between two or more objects are identified as direct or indirect." (page 7, lines 4-5). Applicants respectfully disagree.

Applicants respectfully submit that Figures 2-5 in Brown show directed relationships the "defines a structural organization of the objects in the collection, therefore a directed relationship is also called a structural relationship." (col. 8, lines 36-38). The lines shown in Figures 2-5 are hyperlinks 15 (col. 8, lines 58-63), which are a direct relationship, and dashed hyperlinks 25 that organize the topically and structurally relevant objects into a hierarchy (col. 10, lines 34-36), which are also direct relationships. As a result, applicants respectfully submit that Brown does not disclose, teach or suggest the use of indirect relationships. Applicants respectfully submit that the other references do not cure this deficiency. As a result, claims 1, 109, 127 and 151, as amended, are allowable under 35 U.S.C. § 103(a).

Second, applicants respectfully submit that the cited references, either alone or in combination, do not disclose, teach or suggest "where relationships between two or more objects within the Object-Relationship Database are: . . . (c) grouped into categories selected from the group consisting of a positive effect, a negative effect, a physical association and a logical association" as recited in claim 127, as amended. The Office Action indicated that "Brown further teaches wherein the relationships are set into categories selected from the group consisting of positive, negative, physical, and logical associations." (page 7, lines 9-11). Applicants respectfully disagree.

Applicants respectfully submit that cited portion of Brown states "Each iteration of steps 630 and 700 produces one structurally relevant set defined by a given structural relationship, e.g., hypertext link, geographic location, category, etc." (col. 13, lines 49-51). Applicants respectfully submit that these sets or relationships are not categories selected from the group consisting of positive, negative, physical, and logical associations as recited in claims 1, 109, 127 and 151. Applicants respectfully submit that the other references do not cure this deficiency. As a result, claims 1, 109, 127 and 151, as amended, are allowable under 35 U.S.C. § 103(a).

Third, applicants respectfully submit that the cited references, either alone or in combination, do not disclose, teach or suggest "where relationships between two or more objects within the Object-Relationship Database are: . . . (d) ranked based on a relative strength of the identified relationship between direct and indirect objects" as recited in claim 127, as amended. The Office Action indicated that "Brown further teaches wherein the relationships between the two or more integrated objects are ranked based on the relative strength of the relationship between direct and indirect objects." (page 7, lines 6-8). Applicants respectfully disagree. Since Brown does not disclose, teach or suggest relationships between indirect objects as described above, applicants respectfully submit

that Brown does not disclose, teach or suggest the use of indirect relationships. Applicants respectfully submit that the other references do not cure this deficiency. As a result, claims 1, 109, 127 and 151, as amended, are allowable under 35 U.S.C. § 103(a).

For at least the reasons stated above, applicants respectfully submit the cited references, either alone or in combination, do not disclose, teach or suggest every element recited in claims 1, 109, 127 and 151, as amended. Claims 1, 109, 127 and 151 are, therefore, allowable under 35 U.S.C. § 103(a). Accordingly, applicants respectfully request that the rejection of claims 1, 109, 127 and 151 be withdrawn.

Claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135

Applicants respectfully submit that claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135 depend from claims 1 and 127 which are allowable for the reasons stated above, and further distinguish over the cited references. Claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135 are, therefore, allowable under 35 U.S.C. § 103(a). Accordingly, applicants respectfully request that the rejection of claims 2-3, 7-8, 10, 14-15, 17-29, 47-58, 128-130 and 132-135 be withdrawn.

With respect to claim 18, applicants respectfully submit that Kennedy does not disclose, teach or suggest identifying capitalizations and patterns for words because it is not required to eliminate the duplicate response to a query, which is the stated purpose of Kennedy. As a result, applicants respectfully submit that claims 51-52 are allowable under 35 U.S.C. § 103(a).

With respect to claims 19-20 and 24, applicants respectfully submit that Kennedy does not disclose, teach or suggest the use of an acronym resolving algorithm because it is not required to eliminate the duplicate response to a query, which is the stated purpose of Kennedy. As a result, applicants respectfully submit that claims 19-20 and 24 are allowable under 35 U.S.C. § 103(a).

With respect to claims 51-52, applicants respectfully submit that Brown does not recompute an object network or recompute results as recited in claims 51-52. The cited portions of Brown describe iterations to determine the levels of a hierarchy, which is not recomputing an object network or recomputing results. As a result, applicants respectfully submit that claims 51-52 are allowable under 35 U.S.C. § 103(a).

Conclusion


For the reasons set forth above, applicants respectfully request reconsideration by the examiner and withdrawal of the rejections. Applicants submit that claims 1-3, 7-8, 10-29, 45, 47-61, 68-69, 109, 127-135 and 151, as amended, are fully patentable. Applicants respectfully request that a timely Notice of Allowance be issued in this case. If the examiner has any questions or comments, or if further clarification is required, it is

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requested that the examiner contact the undersigned at the telephone number listed below.

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Respectfully submitted,
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